

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEW JERSEY

3 THE CITY OF NEWARK,

4 Plaintiff,

5 v.

6 GEO RE-ENTRY GROUP, LLC; ABC CORP  
7 (A FICTITIOUS COMPANY) 1-100; and THE  
8 GEO GROUP, INC.

9 Defendants.  
10

No. 2:25-cv-02225

**AFFIDAVIT OF ESKER L.  
TATUM, JR.**

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12 I, Esker L. Tatum, Jr., being first duly sworn, depose and state under penalty of perjury and  
13 under the laws of the State of New Jersey that the following statements are true and correct to the  
14 best of my knowledge and belief:

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16 1. I execute this affidavit in support of the notice of removal filed by defendants GEO RE-  
17 ENTRY GROUP, LLC; ABC CORP (A FICTITIOUS COMPANY) 1-100; and The GEO Group,  
18 Inc. (collectively "GEO").

19 2. I am the Facility Administrator of the Delaney Hall ICE Processing Center ("Delaney Hall"  
20 or the "Facility") and an employee of GEO.

21 3. GEO is contracted to provide secure residential housing and support services in the State  
22 of New Jersey pursuant to a contract with Immigration and Customs Enforcement ("ICE"),  
23 including secure residential housing and support services at the GEO owned Delaney Hall.  
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26 4. Consistent with the requirements of GEO's contract with ICE for secure residential  
27 services at Delaney Hall, ICE exercises exclusive control over all access to secure portions of  
28 Delaney Hall.

1 5. On March 31, 2025, City of Newark Officials came to Delaney Hall attempting to obtain  
2 access.

3 6. Assistant Facility Administrator Luis Soto explained to the City of Newark Officials that  
4 he would need to obtain clearance from ICE regarding access to Delaney Hall.

5 7. It was communicated to me that ICE Headquarters instructed that the City of Newark  
6 Officials would not be permitted access.

7 8. In light of this, I advised the City of Newark Officials that they needed to schedule an  
8 appointment with ICE to enter the Facility.

9 9. I attempted to provide City of Newark Officials contact information for the appropriate  
10 person at ICE, but they refused my offer and promptly left the Facility.

11 10. All requests for access to the secure portions of Delaney Hall must obtain pre-clearance  
12 approvals from ICE, including all requests for access by federal and state employees, as well as  
13 GEO employees.

14 11. GEO is without authority to provide access to the secure portions of Delaney Hall absent  
15 ICE clearance and approval.

16 I declare under penalty of perjury under the laws of the United States of America and the State of  
17 New Jersey that the foregoing is true and correct.

18 Executed this 1<sup>st</sup> day of April 2025, in Newark, New Jersey.

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Esker L. Tatum, Jr.